REMARKS/ARGUMENTS

Claims 1, 5-10, 17, 22, 42, 50-52, 55-59, 61, 92, 107, 108, 110, 113, and 114 are currently pending. Claims 1, 50, 92 and 107 are amended.

Claims 1, 5-10, 17, 22, and 42 are rejected under 35 U.S.C. 112, second paragraph, as indefinite for including the term "capable of." Claims 1 and 92 are amended to delete the term "capable of." Accordingly, it is respectfully requested that the above rejections be withdrawn.

In the previous Office action dated 3/23/05, claims 1, 5-10, 16, 17, 22, 42, 50-52, 55-59, 61, 92, 107, 108, 110, 113, and 114 were rejected under 35 U.S.C. 103 as being unpatentable over Cordery et al. (US 6,466,921) in view of Pierce et al. (US 6,151,591) and Rosenzweig et al. (US 6,081,810).

In a response dated 7/25/05, Applicant amended independent claim 1 to include, among other limitations, "a plurality of cryptographic modules, each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users, wherein before each of the authentication, processing value, and generating indicia data for a given user is performed, the respective cryptographic module retrieves the data record for the given user from the database." Applicant then argued that none of the cited references, alone or in combination teach or suggest the above limitations.

In the current Office action dated 10/12/05, the above same claims are rejected over the same three references (Cordery, Pierce and Rosenzweig), further in view of either Gupta or Rosen. The current Office action also states that "Applicants arguments filed [on] 7/28/05 are moot due [to] the new grounds of rejection." (Office action, page 11, second paragraph.).

However, there is no indication in the current Office action as to how and where Gupta or Rosen cure the deficiencies of Cordery, Pierce and Rosenzweig combination with respect to the above-mentioned amended limitations.

Applicant again respectfully submits that none of the cited references, alone or in combination teach or suggest the above limitations.

First, the limitation of "each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users," is not taught or suggested by Cordery.

Rather, Cordery's system includes a meter box 44 that generates at least one digital token or signs the postage transaction and updates the meter record (that is, processing value) corresponding to the transaction for each postage transaction. Additionally, Cordery's system includes an authentication box 40 to authenticate a mailer; and a transaction box 42 to sign user transaction records, such as logins. (FIG. 2, and col. 7, lines 35-65, emphasis added.).

Cordery is very clear about the functions performed by each of its secure boxes located in the Data Center 30. "Function Server 34 communicates mailer records from mailer database 62 to authentication box 40, which then authenticates the mailer requesting the transaction." (Col. 8, lines 14-17, emphasis added.). "Once the mailer has been authenticated, Function Server 34 communicates the appropriate meter record 64 to meter box 44, which . . . performs accounting functions on the ascending and descending registers in meter record 64." (Col. 8, lines 17-23, emphasis added.). "Meter box 44 then generates data for an indicium, and resigns meter record 64." Col. 8, lines 24-25, emphasis added.).

In other words, in Cordery's system, an authentication box 40 authenticates the mailer, and a different meter box 44 processes values and generates indicium data. Accordingly, Cordery does not teach or suggest "each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users."

Additionally, Pierce, Rosenzweig, Gupta or Rosen alone or in combination, do not cure the above deficiencies of Cordery.

Pierce's system has "local and remote PSDs include[ing] respectively first and second unique identification, postal value storage and digital signature generator. The first client module is connected to a remote data center that includes third unique identification, third postal value storage and a third digital signature generator. The first client module selectively requests one of

a first evidence of postage payment from the local PSD, a second, evidence of postage payment from the remote PSD and a third evidence of postage payment from the data center." (Abstract).

However, pierce's system does not have a plurality of cryptographic modules in a server system. Even if the PSDs 40 may be construed as the plurality of cryptographic modules, each of those PSDs are for postage meter processing of only a portion of the users, for example, "based on matching the origin zip code of the PSD to the zip code of the return address of the mailpiece" (col. 9, lines 38-40), or based on a list of the available PSD for a particular user to select from (Col. 9, lines 2-5). Therefore, Pierce, like Cordery, does not teach or suggest "each of the plurality of cryptographic modules <u>for</u> authenticating, processing value for the VBI, and generating indicia data for the plurality of users," as required by claim 1.

Rosenzweig is about access control to a database and does not teach or suggest "a plurality of cryptographic modules, each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users."

Similarly, Gupta is directed to a method for authenticating users and does not teach or suggest "a plurality of cryptographic modules, each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users."

Likewise, Rosen teaches an electronic ticket presentation and transfer method in which a customer trusted agent securely communicating with a first money module, and a merchant trusted agent securely communicating with a second money module. There is no teaching or suggestion in Rosen about "a plurality of cryptographic modules, <u>each of</u> the plurality of cryptographic modules for <u>authenticating, processing value</u> for the VBI, and <u>generating indicia data</u> for the plurality of users."

Accordingly, Cordery, Pierce, Rosenzweig, Gupta or Rosen, alone or in combination, do not teach or suggest the limitation of "a plurality of cryptographic modules, each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users."

Second, the limitation of wherein "the respective cryptographic module retrieves the data record for the given user from the database," is not taught or suggested by Cordery. Rather, in Cordery's system, as clearly shown in FIG. 3 and described in the related text, only the Function Server 34 is capable of accessing the Database Server 36. In "step 105, Function Server 34 requests access to the mailers account information stored in Database Server 36. . . . At step 115, Function Server 34 sends the mailer information to Authentication Box 40. When the mailer is authenticated at step 120, then, at step 125, Function Server 34 sends the meter information, including the meter record to meter box 44. . . . At step 135, Function Server 34 sends the updated and signed meter record to Database Server 36 . . . " (Col. 9, lines 19-35).

Therefore, the information in the database is only accessed by the Function Server and sent to the authentication box to authenticate the mailer (step 120). The account information is then sent from the authentication box to the meter box to process value for the postage and generate indicia data for the mailer (step 130). The Function Server then stores the updated meter record back in the database.

In contrast, according to the present invention as claimed by claim 1, a "respective cryptographic module" that is, any of the cryptographic modules that is going to authenticate, process value, and generate indicia data for a given user "retrieves the data record for the given user from the database." This provides the present invention with the capability of one secure database of data records that is accessible by any of the cryptographic module for the authentication, processing value, and generating indicia data functions.

Likewise, Pierce, Rosenzweig, Gupta or Rosen alone or in combination, do not cure the above deficiencies of Cordery.

Pierce does not teach or suggest wherein the respective cryptographic module retrieves the data record for the given user from a secure database remote from the users including a data record for each of the users, because each PSD of Pierce has its own storage area for storing the meter information. "At step 350, the accessed PSD (local, remote or virtual) deducts the requested postal amount from a total postal value stored in the PSD and generates a signature using information supplied with the request including the addressee information. At step 355, the

PSD sends transaction information including the signature to the requesting Client PC." (Col. 9, lines 26-30, emphasis added.).

Rosenzweig is about access control to a database and does not teach or suggest wherein "the respective cryptographic module retrieves the data record for the given user from the database."

Again, Gupta is directed to a method for authenticating users and does not teach or suggest wherein "the respective cryptographic module retrieves the data record for the given user from the database."

Rosen teaches an electronic ticket presentation and transfer method in which a customer trusted agent securely communicating with a first money module, and a merchant trusted agent securely communicating with a second money module. There is no teaching or suggestion in Rosen about wherein "the respective cryptographic module retrieves the data record for the given user from [a] database" that is "remote from the users including a data record for each of the users."

Consequently, Cordery, Pierce, Rosenzweig, Gupta or Rosen, alone or in combination, do not teach or suggest the limitation of wherein "the respective cryptographic module retrieves the data record for the given user from the database," as required by claim 1.

As a result, claim 1 is patentable over combination of Cordery, Pierce, Rosenzweig, Gupta or Rosen.

Amended independent claim 50 includes, among other limitations, "retrieving the data record for a given user from the database for authenticating the given user; retrieving for a second time the data record for the given user from the database for processing value for the VBI for the given user; updating, and storing back in the database ,the data record for the given user after processing value for the given user; retrieving for a third time the updated data record for the given user from the database for generating indicia data for the given user; and updating, and storing back in the database, the updated data record for the given user after generating indicia data for the given user."

As discussed above, Cordery does not teach or suggest "retrieving for a second time the data record for the given user from the database for processing value for the VBI for the given user" or "retrieving for a third time the data record for the given user from the database for generating indicia data for the given user," because the information in the database is only accessed once by the Function Server and then sent to the authentication box to authenticate the mailer (step 120).

Additionally, Cordery does not teach or suggest "updating and storing back in the database the data record for the given user after processing value for the given user," or "updating and storing back in the database the updated data record for the given user after generating indicia data for the given user," because Cordery's system does the updating and storing back only once after all of the needed processes are completed.

As describes above, it is only after the mailer is authenticated, the value for the postage is processed, AND the indicia data is generated that the updated meter record is stored back in the database. (FIG. 3 and col. 9, lines 23-39).

In contrast, the present invention as claimed by claim 50, updates and stored back the user record after it processes value and again updates and stored back the user record after the indicia data is generated. That is, after each of the value processing and indicia data generation processes, is completed, the data is updated and stored back in the database.

Similarly, Pierce, Rosenzweig, Gupta, or Rosen, alone or in combination with Cordery, do not teach or suggest the above limitations. Consequently, independent claim 50 is also patentable over cited references.
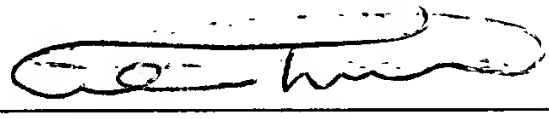
Independent claims 92 and 107 include similar patentable limitations and therefore, they are also patentable over cited references.

Dependant claims 5-10, 17, 22, 42, 51-52, 55-59, 61, 108, 110, and 113-114 depend directly or indirectly from respective allowable claims 1, 50 and 107, and thus are allowable as are claims 1, 50 and 107, and for additional limitations recited therein.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By _____

Raymond R. Tabandeh
Reg. No. 43,945
626/795-9900

RRT/clv
CLV PAS659531.1-*-01/11/06 10:33 AM